



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

Frank

January 20, 1994

Douglas Hefferin
Director, Environmental Protection
Ciba-Geigy Corporation
444 Saw Mill River Road
Ardsley, New York 10502-2699

Re: Modification of the schedule for submittal of documents
required by the Administrative Consent Order: Ciba-Geigy
Corporation, Cranston Facility - RCRA Docket # I-88-1088.

Dear Mr. Hefferin:

Pursuant to the Subsequent Modification section of the above
referenced Administrative Consent Order, this letter modifies the
schedule for submittal of documents required by Sections I.E.5-7,
III.3, IV, V, VII, IX, AND XI of the Order and the corresponding
schedules in any previously approved documents.

The Modification allows Ciba-Geigy Corporation (CIBA) to combine
the RCRA Facility Investigation (RFI) Report, the Media
Protection Standard (MPS) Proposal, and the Corrective Measures
Study (CMS) Report into one consolidated document. This
Modification will eliminate needless duplication of whole
sections of documents and will allow CIBA an uninterrupted period
of time to complete development and submittal of documents
required by the Consent Order. The Modification will also
eliminate the requirement that the EPA review and approve all
interim documents before CIBA can proceed to the next mandated
activity.

This Modification shall amend the existing Order in the following
manner:

- 1) Ciba-Geigy Corporation (Respondent) shall submit a final
document which incorporates a RFI Report, a MPS Proposal,
and a CMS Report to the EPA for approval on or before
September 15, 1995.



- 2) Respondent shall not submit a CMS Proposal for approval to the EPA prior to beginning the CMS or prior to the submittal of the final document. Respondent shall submit a letter to the EPA that identifies the proposed corrective measures to be studied and a justification for their selection prior to beginning the CMS.
- 3) Meetings may be held, as necessary, at critical decision points (i.e., proposed MPS, proposed CMS, etc.) during the planning for these activities. Meetings shall be held between four (4) and eight (8) weeks after a written request by Respondent to the EPA. Respondent shall document and distribute the minutes of these meetings to the EPA within two (2) weeks after the meeting.
- 4) In the event that Respondent wishes to assert that required river activities set out in Section III.3 of the Order will not be completed in time to be included with the final document by the September 15, 1995 deadline, Respondent shall provide written justification to EPA at least three (3) months in advance of the deadline. EPA may allow additional time for the submittal of an addendum to the final document for the river activities based on good cause shown.
- 5) Upon written request and justification by Respondent, EPA may allow additional time for Respondent to submit the final document or any part of the final document required in paragraph #1, above.

In accordance with the Subsequent Modification section of the above referenced Order, this Modification must be signed by both parties and will be effective upon signature by EPA. If the Modification, as set out above, is acceptable to Ciba-Geigy Corporation, please sign where indicated on the following page and return this Modification to Frank Battaglia at the following address:

U.S. Environmental Protection Agency
Waste Management Division - [HRR-CAN3]
J.F.K. Federal Building
Boston, MA 02203

EPA will then sign and date the Modification below, file the original with the Regional Hearing Clerk and mail a fully executed copy to you.

Sincerely,

Frank Lavettier

fr Merrill S. Hohman, Director
Waste Management Division
U. S. Environmental Protection Agency

Douglas Hefferin, Director, Environmental Protection, Ciba-Geigy Corporation hereby warrants that he is authorized to sign this Modification on behalf of the Respondent and that the Modification, as set out above, is acceptable to Ciba-Geigy corporation:

Douglas J. Hefferin
Douglas Hefferin
Director, Environmental Protection
Ciba-Geigy Corporation

Patricia L. Meaney, Acting Regional Administrator, U.S. EPA Region I hereby warrants that she is authorized to sign this Modification on behalf of the Complainant and that the Modification, as set out above, is acceptable to EPA Region I:

Patricia L. Meaney
Patricia L. Meaney
Acting Regional Administrator
U. S. Environmental Protection Agency

2-4-94
EFFECTIVE DATE

10994

Douglas Hefferin
Director, Environmental Protection
Ciba-Geigy Corporation
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CONCURRENCES							
SYMBOL	HRR	HRR	RCR	HRH	HAA		
SIGNATURE	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>	
DATE	1-5-94	1-7-94	1/13/94	1/18/94	1/19/94	2/4/94	
EPA Form 1320-1 (12-82)							

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